

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS H. HAGLOF,

Defendant.

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Cause No. 4:20-CR-00384 HEA/SPM

DEFENDANT'S MOTION TO MODIFY BOND CONDITIONS

Comes now Defendant, by and through Counsel, and hereby respectfully requests that this Court modify the conditions of his release, namely permitting location monitoring with curfew and approved times to be determined by the Pretrial Office. In support of his request, Defendant states as follows:

1. On August 5, 2020, Defendant was charged by Indictment with one count of Receipt of Child Pornography and one count of Accessing with Intent to View Child Pornography.
2. Subsequently, on August 13, 2020, Defendant was released on his own recognizance. Furthermore, amongst other conditions, Defendant was required to submit to location monitoring with home detention by the Pretrial Services Office.
3. Defendant would respectfully request that this Court modify his conditions of release to permit location monitoring with curfew and an approved leave time to be determined by the Pretrial Officer.
4. Defendant recently obtained employment and has been compliant with the terms of his release.

5. Defendant requests location monitoring with curfew based on his new full-time employment. Permitting Defendant to modify his conditions of release to location monitoring with curfew and an approved leave time would allow Defendant to get to and from work and complete all of his daily activities while remaining compliant with all other conditions of release.

6. Defendant's pretrial officer has no objection to the modification of his conditions of release, per conversations with counsel.

WHEREFORE, Defendant respectfully requests that this Court modify his conditions of release and permit location monitoring with curfew and approved times to be determined by the Pretrial Officer.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By /s/ Daniel A. Juengel
DANIEL A. JUENGEL (#42784MO)
Attorneys for Defendant
7710 Carondelet Avenue, Suite 350
Clayton, Missouri 63105
(314) 725-7777

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Jillian Anderson
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/ Daniel A. Juengel
DANIEL A. JUENGEL